

NICHOLAS A. TRUTANICH
United States Attorney
District of Nevada
Nevada Bar Number 13644
REBECCA CLINTON
Assistant United States Attorney
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
Phone: (702) 388-6336
Email: rebecca.clinton@usdoj.gov
Attorney for the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

PLAINTIFF,

VS.

JONATHAN RAYMOND LISH,

DEFENDANT.

Case No. 2:19-mj-531-GWF

CRIMINAL COMPLAINT

COUNT I

Sexual Exploitation of Children,
in violation of 18 U.S.C. § 2251(a) & (e)

BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned
Complainant, being first duly sworn, deposes and states:

COUNT ONE
Sexual Exploitation of Children

Beginning on a date unknown, and continuing to on or about March 21, 2019, in the
State and Federal District of Nevada and elsewhere,

JONATHAN RAYMOND LISH,
defendant herein, did employ, use, persuade, induce, entice, and coerce a minor, "VICTIM-1",
to engage in, any sexually explicit conduct for the purpose of producing any visual depiction of
such conduct, and that visual depiction was produced and transmitted using materials that have

1 been mailed, shipped, and transported in and affecting interstate and foreign commerce by any
2 means, including by computer, all in violation of Title 18, United States Code, Sections 2251(a)
3 and (e).

4 **PROBABLE CAUSE AFFIDAVIT**

5 I, Scott Miller, Complainant, as and for probable cause, state the following:

6 1. I am currently assigned as a Detective with the Las Vegas Metropolitan Police
7 Department (LVMPD) and assigned to investigate Internet Crimes Against Children (ICAC). I
8 have approximately nine years of experience as a Detective. I have received training in the field
9 of child pornography, internet crimes against children, and interview and interrogation. I am
10 currently a Task Force Officer (TFO) and member of the FBI's Child Exploitation Task Force.
11 I have been a TFO since 2016.

12 2. This Affidavit is made in support of a complaint charging JONATHAN
13 RAYMOND LISH with a violation of Title 18, United States Code, Section 2251(a) and (e),
14 which makes it illegal to employ, use, persuade, induce, entice, and coerce a minor, "VICTIM-
15 1", to engage in, any sexually explicit conduct for the purpose of producing any visual depiction
16 of such conduct, and that visual depiction was produced and transmitted using materials that
17 have been mailed, shipped, and transported in and affecting interstate and foreign commerce by
18 any means, including by computer.

19 3. The statements contained in this affidavit are based on an ongoing LVMPD
20 investigation for which I have been personally involved, and also includes information obtained
21 from other law enforcement officials involved in the investigation. I have not included each and
22 every fact known to me, but rather have included information establishing probable cause. All
23 times are approximate.

24 4. As an Electronic Communication Service Provider (ECSP), per United States

Code: Title 42: Section 13032, *Microsoft (Skype)*¹ is mandated to report incidents of online child sexual exploitation to the CyberTip Line operated by the National Center for Missing and Exploited Children (NCMEC). Pursuant to a Congressional Mandate, NCMEC functions as a national clearinghouse for information on missing and exploited children. NCMEC gathers and forwards all information to law enforcement agencies for investigation and disposition.

5. On or about May 21, 2018, NCMEC received a report from *Microsoft (Skype)* reference the electronic transmissions of child pornography. *Microsoft (Skype)* reported a user uploaded **one** file of child sexual exploitation to their *Microsoft (Skype)* account. *Microsoft (Skype)* provided the following information regarding the user:

a. **Screen/User Name:** live:jimzy666

Uploading IP Address: 70.180.131.191

Date of Incident: May 20, 2018 at 06:59:42 UTC

6. This was documented under NCMEC CyberTip #33013456 and forwarded on July 07, 2018, to LVMPD for follow-up investigation. Your Affiant viewed the one file of uploaded child sexual exploitation and found said image to be child pornographic in nature. The following is a description of said image:²

a. **File Name:** 371ba8a5-ac02-477e-b730-2707336b7175.jpg

SHA1: C53BE7FFECCFED4F2559E8CDC2A56B05F5E92FD7

¹ I know that the Internet Service Provider (ISP) known as Microsoft (Skype) specializes in Internet-related services. Skype Technologies S.A.R.L. is a telecommunications company, whose chief business is the manufacturing and marketing of the video chat and instant messaging computer software program Skype, and various Internet telephone services associated with it. Skype is a communication service owned by Microsoft and allows users to message one another and place calls around the globe.

² All copies of images described in this affidavit have been made available to the Court in making its probable cause determination and will be maintained by the Affiant during the pendency of this case pursuant to 18 U.S.C. § 3509(m).

Image Description: This image depicts a close-up of a nude pre-pubescent female toddler, approximately 2 to 4 years of age, lying on her back with her legs spread apart. The image is a close-up of the toddler's vagina, which is seen covered with apparent semen. The toddler has a diminutive stature, lacks fatty deposits and lacks pubic hair development.

7. On or about May 21, 2018, NCMEC received a report from *Microsoft (Skype)* reference the electronic transmissions of child pornography. *Microsoft (Skype)* reported a user uploaded **one** file of child sexual exploitation to their *Microsoft (Skype)* account. *Microsoft (Skype)* provided the following information regarding the user:

- a. **Screen/User Name:** live:jimzy666
- Uploading IP Address:** 70.180.131.191
- Date of Incident:** May 20, 2018 at 01:29:41 UTC.

8. This was documented under NCMEC CyberTip #33014604 and forwarded on July 07, 2018, to LVMPD for follow-up investigation. Your Affiant viewed the one file of uploaded child sexual exploitation and found said image to be child pornographic in nature. The following is a description of said image:

- a. **File Name:** c952ebc5-b5e1-4a92-b1ab-817f6cecc6b09.jpg
- SHA1:** 296848D2F67EE9A9AE1346193F845A08D70D3A87
- Image Description:** This image depicts two nude pre-pubescent children, approximately 6 to 9 years of age. The female child is positioned on her knees as she is seen performing fellatio on the male child's erect penis. Both children have diminutive statures,

1 lack fatty deposits, breast development and pubic hair
2 development.

3 9. On January 2, 2019, Investigative Specialist Lisa Rowe served an administrative
4 subpoena on Microsoft Corporation for subscriber information for Skype user live:jimzy666.
5 On January 18, 2019, Microsoft Corporation responded with Skype user live:jimzy666
6 resolving to: Jim Henson, email: jimzy666@outlook.com, IP address: 70.180.131.191, with an
7 account creation time of May 13, 2018.

8 10. On January 02, 2019, Specialist Rowe served an administrative subpoena on
9 Cox Communications for subscriber information and complete IP History for the IP address
10 70.180.131.191 accessed on or about May 20, 2018, at 06:59 hours GMT. On February 04,
11 2019, Cox Communications responded with IP address 70.180.131.191 resolving to: the mother
12 of VICTIM-1, and what was later determined to be VICTIM-1's residence in Las Vegas,
13 Nevada ("VICTIM-1's residence"). IP address 70.180.131.191 showed as being active from
14 2018-02-09 through 2019-02-05.

15 11. On March 20, 2019, Specialist Rowe served an administrative subpoena on NV
16 Energy for the address of VICTIM-1's residence. NV Energy responded with the address of
17 VICTIM-1's residence, resolving to the mother of VICTIM-1.

18 12. On February 20, 2019, your Affiant had a search warrant signed by District
19 Court Judge David M. Jones, and served said search warrant on Microsoft Corporation for all
20 subscriber information and account content regarding email: jimzy666@outlook.com, from
21 dates May 20, 2018 through February 15, 2019.

22 13. On February 20, 2019, Your Affiant had a search warrant signed by District
23 Court Judge David M. Jones, and served said search warrant on Microsoft Corporation for all
24 subscriber information and account content regarding Skype User Account: live:jimzy666, from

1 dates May 20, 2018 through February 15, 2019.

2 14. In March 2019, your Affiant received both search warrant returns from
3 Microsoft Corporation. Affiant reviewed both search warrant returns and determined that both
4 accounts resolve to the same person at the IP address of 70.180.131.191.

5 15. On March 20, 2019, your Affiant was reviewing the search warrant return from
6 Microsoft Corporation regarding Skype user account: live:jimzy666. Your Affiant found a chat
7 log that began on May 20, 2018, between user live:jimzy666 and user gluesmetal123 (who was
8 determined to reside in the United Kingdom). Upon reviewing the content of this chat log
9 between these two users, your Affiant noticed that both users seemed to exchange
10 images/videos of child exploitation and discussed raping children together and killing them
11 when they were done. User live:jimzy666 discussed numerous incidents of sexually assaulting
12 young children. During this chat, live:jimzy666 claimed to have a three-year-old daughter and
13 both users discussed sexually assaulting her. User live:jimzy666 appeared to be connecting to
14 user gluesmetal123 over live video and exposing his daughter's vagina and anus. Your Affiant
15 also noticed numerous chats where both users discussed "snuffing" children and having sex
16 with their dead corpses. Your Affiant is including a sample of some of the chats between said
17 users below. This sample contains excerpts from a long chat log between the users and does not
18 include the entire chat log:

19 a. Gluesmetal123: You ever use her?
20 live:jimzy666: No. Others though
21 Gluesmetal123: Anyone ever been in her?
22 live:jimzy666: No. Price has to be right
23 gluesmetal123: She ever suck you?
24 live:jimzy666: I've thought about it hard

1 gluesmetal123: You should do it bro
2 live:jimzy666: I want to
3 gluesmetal123: What's stopping you?
4 live:jimzy666: Going to prison ha
5 live:jimzy666: For some reason I haven't touched my own but ive
6 done plenty with others kids
7 gluesmetal123: Whats the youngest you done?
8 live:jimzy666: 2
9 live:jimzy666: She put it in her mouth and let me blow
10 live:jimzy666: Now I'm addicted
11 live:jimzy666: I've had my finger in a toddler while she held my dick
12 live:jimzy666: In her asd
13 live:jimzy666: I have a tiny cock so it's easy for them to take
14 live:jimzy666: My cousin was asleep at 4yr and I pulled her little
15 princess panties down and slit in At first she opened her
16 eyes and asked me to get off but when I was about to
17 she grabbed my shirt and pulled me back down and told
18 me that feels good I almost came instantly but she must
19 have felt me get harder inside her because she stayed
20 grinning her little hole against me
21 gluesmetal123: Did you unload in her?
22 live:jimzy666: Yep. Then I continued to sit for her and got it almost 20
23 more times
24 gluesmetal123: She never told on ya?

1 live:jimzy666: Nope. She is sick as we are
2 gluesmetal123: You got a wife?
3 live:jimzy666: Yeah
4 gluesmetal123: She a heavy sleeper?
5 live:jimzy666: No but I'll give her cough meds
6 gluesmetal123: You ever force one?
7 live:jimzy666: Yes. Both women and kid
8 live:jimzy666: When they screamed I came harder than ever before
9 live:jimzy666: You like the last pic?
10 live:jimzy666: None would suspect me anyway
11 live:jimzy666: Last night I went swimming with my girls 11 year old
12 niece. I must have grabbed her pussy 20 times on
13 accident lol
14 live:jimzy666: Then I let her feel my dick over the swim shorts. She
15 reached for the ball but I knew she wanted to touch it
16 live:jimzy666: Lol. You want to watch her pudgy little lips get rubbed
17 by her daddys tiny dick?
18 live:jimzy666: I know I wouldn't cause I'd keep fucking your mouth
19 while I watch you slide into my toddler
20 live:jimzy666: If I were there we would hunt a playground and take
21 two for ourselves. Take it til they screamed and begged
22 then I'd take it more. We'd swith off and force both girls
23 faces onto our dicks till they throw up on it then I'd keep
24 fucking her little tonsils while you tore her pussy in half

1 while her friend cried and begged us to stop

2 live:jimzy666: Then keep pumpin cum into her lifeless fuckhole.

3 Gluesmetal123: You able to set your cam up so you don't need to hold

4 it?

5 live:jimzy666: Yeah I'll do that

6 live:jimzy666: Tell me your darkest

7 gluesmetal123: Darkest would be to get a girl I don't know and use her

8 for weeks. Keep her like an animal... then snuff her out

9 when I'm done

10 live:jimzy666: Nice. I'd use her corpse for weeks

11 live:jimzy666: Heat her up and unload again

12 live:jimzy666: It's already be cumming in you while your cock

13 twitched inside my 3 yr old

14 live:jimzy666: I knew a girl once. She loved to get high on meth and suck

15 her little boys dick while I fucked her

16 live:jimzy666: Then she let me fuck her infants mouth

17 live:jimzy666: Yes I dig. Her little boy I think was Gary cause he

18 loooved me humping his mouth

19 live:jimzy666: Bathe her. I'll spread her for you. Maybe I can get

20 away with letting her taste

21 live:jimzy666: Gets me harder just thinking about my finger sliding

22 into a tiny baby cunt... then shoving my dick hard

23 down her throat

24 live:jimzy666: I want to rape a whole preschool class with you. Then

1 end them while we film their corpses with our hot
2 fucking cum
3 live:jimzy666: I'm capable of murder but only others not mine
4 gluesmetal123: You got any pics of her little puss?
5 live:jimzy666: Lemme see. Think I have 1
6 live:jimzy666: God I wanna drug my gf so I can fuck my toddler
7 gluesmetal123: Just take a few pics of your toddlers pussy
8 live:jimzy666: (sends an image)
9 gluesmetal123: Look at that tight asshole... spread it for me and take a
10 pic
11 live:jimzy666: So you ever snuff?
12 Gluesmetal123: Never. You?
13 live:jimzy666: I wish... I've almost... I bet the release is huge
14 live:jimzy666: I have a bit of bad news. I'll rape any toddlers wet juicy
15 holes until I shatter her bones from hate fucking my
16 cum into her frail body... but I can't do it to mine
17 live:jimzy666: I'll spread her open for you and even glide my fingers
18 into it but I can't fuck my kid... I'll fuck any kid you
19 sit on my cock but I can't fuck my kid
20 16. Your Affiant also recovered images and videos of child pornography
21 from the Skype return. Your Affiant also recovered two images of VICTIM-1, one of which
22 constitutes child pornography. User live:jimzy666 sent these images to gluesmetal123 in the
23 Skype chat. Your Affiant also recovered images of the subject's penis and appears to match the
24 description as he described it to be in the chats. Your Affiant believes that subject live:jimzy666

1 shared these images and videos with user gluesmetal123. Based on the chats, your Affiant was
2 concerned that the father of a young female toddler is sexually abusing her as well as other
3 unidentified juveniles. Your Affiant has identified the father as Jonathan Lish, middle name of
4 Raymond, date of birth 05/02/1984, address of VICTIM-1's residence. Below is a description
5 of one of the images of VICTIM-1:

6 a. **File Name:** 20180520_002730.jpg

7 **MD5:** 667589391AFAC139D7B996433466575A

8 **Image Description:** This image depicts a close-up of VICTIM-1 lying on her
9 side on a bed. The child has her pants pulled down to expose her vagina and
10 buttocks. The focus of this image is a close-up of the child's vagina and buttocks.
11 This child has a diminutive stature, lacks fatty deposits, breast development and
12 pubic hair development. This child has been confirmed to be Jonathan Lish's
13 daughter who is three years of age.

14 17. On March 21, 2019, at approximately 0900 hours, the Internet Crimes against
15 Children Task Force (ICACTF), under the direction of Sergeant Antonio Campanella, served a
16 search and seizure warrant that was issued by the District Court Judge Tierra D. Jones, for the
17 property located at VICTIM-1's residence. LVMPD officers were attired in clear law
18 enforcement identifiers. Detective Miller made contact with the occupants after knocking on
19 the door and Jonathan Lish, the mother of VICTIM-1, VICTIM-1 and VICTIM-1's uncle all
20 exited said residence without incident. LVMPD officers then made entry and conducted a
21 safety sweep of the residence while continuing to call for potential occupants to exit the
22 residence. No other occupants were located inside the residence.

23 18. Lish was interviewed accordingly and this interview was recorded.
24 Detective Miller read Lish *Miranda* rights and Lish said that he understood his rights. Lish then

1 admitted that he did have an email address that belonged to him of jimzy666@outlook.com
2 and that he had a Skype account under user name: live:jimzy666. Lish stated that he and his
3 live-in girlfriend of five years reside at the address of VICTIM-1's residence. Lish identified his
4 girlfriend as the mother of VICTIM-1 and stated they have a three-year-old daughter together.
5 Lish stated that their internet service provider is Cox Communications and that they have
6 password protected Wi-Fi in their residence. Lish then admitted to chatting with a guy in the
7 United Kingdom in 2018 using Skype. Lish stated that he used a Samsung phone to
8 communicate with the individual. Lish stated that he was abusing methamphetamine at the
9 time and remembered that they talked about some disturbing things, but that it was all fantasy
10 only. Lish also said that the person in the UK kept wanting to see Lish's kid. Lish denied ever
11 viewing or distributing child pornography. When asked if he had ever taken nude images or
12 video of his daughter nude, he said that he had not. After Detective Miller showed him
13 sanitized copies of nude images of his daughter that he had produced and distributed to the
14 person in the United Kingdom, he said he could not remember doing that and that it must have
15 been the drugs. Lish denied ever touching his daughter or any other children in a sexual
16 manner.

17 19. On March 21, 2019, VICTIM-1 was forensically interviewed at the Southern
18 Nevada Children's Assessment Center (SNCAC), but did not disclose any sexual abuse.
19 VICTIM-1 also had a SCAN exam completed at the SNCAC, with normal findings.

20 20. On March 21, 2019, Crime Scene Investigators (CSI) responded and documented
21 Lish's person, both clothed and nude, to include close-ups of his penis to compare to images of
22 his penis he sent to said male in the United Kingdom. CSI also obtained DNA and fingernail
23 scrapings from Lish, all of which was included in the scope of this search warrant. On March
24 21, 2019, several items of bedding, including pink bedding that matched the bedding in the

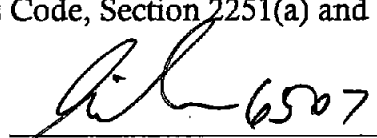
1 pornographic images of VICTIM-1, and children's clothing were seized to be processed for
2 DNA in a lab environment.

3 21. On March 21, 2019, Detective Miller spoke with the mother of VICTIM-1. She
4 was extremely upset by the news of what her boyfriend was involved in and services were put in
5 place for her by CPS. Detective Miller showed the mother of VICTIM-1 the sanitized image of
6 VICTIM-1 described in paragraph 16, subparagraph a. and another image of VICTIM-1 from
7 the Skype return. The mother of VICTIM-1 identified VICTIM-1. The mother of VICTIM-1
8 acted appropriately and it is not believed she is involved in any wrongdoing.

9 22. On March 21, 2019, Forensic Previews were completed on scene by LVMPD
10 Forensic Examiner Matt Trafford, P#14286, and evidence of child exploitation was found on
11 electronic devices that were previewed. A forensic exam also revealed further evidence of child
12 exploitation on a micro SD card that was found inside of a Samsung phone.

13 CONCLUSION

14 23. Based on my training, experience and the totality of the facts related, I submit
15 that there is probable cause to believe that JONATHAN RAYMOND LISH, defendant herein,
16 has violated Title 18, United States Code, Section 2251(a) and (e), *Sexual Exploitation of Children*.

17 
18 Scott Miller
19 Detective, Las Vegas Metropolitan Police Department
Task Force Officer, Federal Bureau of Investigation

20 Subscribed and sworn to before me this 18th day of July, 2019.

21 
22 United States Magistrate Judge
23
24